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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

**ROBERT F. KENNEDY, JR. ET AL.,**

*Plaintiffs,*

v.

**CASE NO. 23-cv-0381**

**CONSOLIDATED WITH CIVIL ACTION  
NO. 22-cv-01213 (LEAD)**

**JOSEPH R. BIDEN ET AL.,**

*Defendants.*

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**DECLARATION OF CONNIE SAMPOGNARO**

I, CONNIE SAMPOGNARO, declare as follows:

1. I am a Louisiana resident, over the age of 18, and competent to testify. I have personal knowledge of the facts set forth herein. I am a Plaintiff in this action, and I submit this declaration in support of Plaintiffs' Supplemental Brief on Standing.
2. I am a healthcare professional, and my husband is an interventional cardiologist with one of the largest sole cardiology practices in the southeast region of the United States.
3. Since the beginning of the pandemic in early 2020, I have been urgently in need of accurate, reliable, up-to-date information about the proper treatment of COVID, but I have been repeatedly prevented from accessing this information because of censorship on the major social media platforms.
4. I have been diagnosed with Lyme Disease, and I am potentially immuno-compromised.
5. Beginning in early 2020, I constantly looked online for accurate COVID information, for myself, my family, and also for my husband's patients, because they are all high risk. For the most part, we were dependent on search via Google, YouTube, Facebook, and

1 Twitter for any information we could gather to help make health decisions for myself, my  
2 family, and my husband's patients.

3 6. My husband and I conferred with many other healthcare professionals in our area, and we  
4 were all finding it very difficult to locate information on proper treatment protocols for  
5 COVID-19.

6 7. Many of the published studies that I initially located, containing useful information about  
7 the treatment of COVID, were being swept off the major social media platforms, or they  
8 were made very difficult to locate.

9 8. There are several specific organizations and individuals I follow online to find  
10 exceptionally valuable and hard-to-find information about vitamins or supplements or  
11 alternative medicines to boost the immune system to help a person fight COVID. Among  
12 these individuals and organizations are Children's Health Defense, Dr. Joseph Mercola,  
13 and GreenMedInfo. These organizations and individuals have been among the few  
14 sources of hard data and informed viewpoints challenging the COVID "orthodoxy,"  
15 including the orthodox treatment protocols pressed on the medical community as the  
16 COVID "standard of care." In our view, that orthodoxy was not scientifically or  
17 medically sound, was in some cases medically harmful, and in any event was keeping  
18 from the medical community information about important possible alternative treatments.  
19 But on many occasions, the social media pages of CHD, Dr. Mercola, and GreenMedInfo  
20 were made unavailable or difficult to locate by the platforms. Their videos—along with  
21 those of most all alternative health sites—were censored on YouTube.

22 9. I also followed online a parents' group called Parents' Choice Louisiana, where parents  
23 would exchange information and stories concerning the safest protocols and choices for  
24 children. This group was frequently restricted and blocked on social media platforms.

25 10. The confusion among health care professionals about the proper treatment of COVID  
26 cannot be exaggerated, and our confusion was compounded by the online censorship of  
important voices and data online. I even noticed that pages from FDA and CDC were  
disappearing or would come up with "404" (site not found) error messages.

11. This censorship has prevented me (and many other health care professionals in my  
community) from accessing information from sources we followed on a subject of life-or-

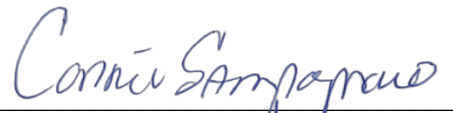
1 death importance—the proper treatment of COVID and the best vitamins or supplements  
2 to take to boost immunity—for me, for my family, and for my husband’s patients.

3 12. While the pandemic is no longer the crisis it was a couple of years ago, COVID is still a  
4 prevalent, serious disease. Moreover, the adverse health effects of the COVID vaccines  
5 are very much a present-day concern, and those effects remain highly uncertain. As a  
6 result, I am still deeply concerned about getting information and viewpoints about  
7 COVID and the COVID vaccines that challenge the orthodox narratives. But I am still  
8 prevented from getting all the information I want from sources I want to receive  
9 information from. For example, I still am unable to get full information from Dr.  
10 Mercola’s, CHD’s, and GreenMedInfo’s social media accounts, all of which remain  
11 restricted, shadow-banned, and censored in a variety of ways. I know this from first-hand  
12 experience, because either I cannot access their social media accounts at all, or I cannot  
13 access their social media content.

14 I declare under penalty of perjury under the laws of the United States that the foregoing is  
15 true and correct to the best of my knowledge and belief.

16 Calhoun, Louisiana

17 July 31, 2024.

18   
19 Connie Sampognaro